

1 John S. Delikanakis, Esq.  
Nevada Bar No. 5928  
2 Gil Kahn, Esq.  
Nevada Bar No. 14220  
3 Christian P. Ogata, Esq.  
Nevada Bar No. 15612  
4 SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
5 Las Vegas, Nevada 89169  
Telephone: (702) 784-5200  
6 Facsimile: (702) 784-5252  
[jdikanakis@swlaw.com](mailto:jdikanakis@swlaw.com)  
7 [gkahn@swlaw.com](mailto:gkahn@swlaw.com)  
[cogata@swlaw.com](mailto:cogata@swlaw.com)  
8

*Attorneys for Defendant Teachers Health Trust d/b/a  
9 THT Trust*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 Luanne Austin,

13 Plaintiff

14 vs.

15 Allied Collection Services, Inc.; Teachers  
16 Health Trust d/b/a THT Health; and  
17 Digestive Disease Center d/b/a Digestive  
Disease Specialists,

18 Defendants

Case No. 2:21-cv-01593-RFB-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**(SECOND REQUEST)**

19  
20 Plaintiff Luanne Austin, individually, on behalf of herself and all others similarly situated,  
21 and Defendants Teachers Health Trust d/b/a THT Health and Digestive Disease Center d/b/a  
22 Digestive Disease Specialists (“DDS”) (collectively “Parties”) through their undersigned counsel,  
23 for good cause shown, hereby stipulate and agree to extend THT Health’s and DDS’s deadline to  
24 respond to the complaint to November 22, 2021, for the following reasons:

25 1. On September 2, 2021, Plaintiff served the complaint and summons on THT  
26 Health.

27 2. This Court previously granted the Parties’ separate requests to extend THT  
28 Health’s deadline to respond to the complaint to October 25, 2021, ECF No. 9, and DDS’s

1 deadline to respond to the complaint to October 29, 2021. ECF No. 12.

2 3. The Parties have been working on obtaining certain information in hopes of  
3 resolving this matter before the response deadline but need more time to do so.

4 4. The Parties agreed to the extension requested herein.

5 5. This extension request is sought in good faith and is not made for the purpose of  
6 delay.

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Therefore, the Parties respectfully request an extension for THT Health and DDS to respond to Plaintiff's complaint up to and including November 22, 2021.

DATED October 22, 2021.

FREEDOM LAW FIRM

By: /s/ George Haines, Esq.  
George Haines, Esq.  
8985 S. Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Tel: (702) 880.5554

*Attorneys for Plaintiffs*

DATED October 22, 2021.

SNELL & WILMER L.L.P.

By: /s/ John S. Delikanakis, Esq.  
John S. Delikanakis, Esq.  
Gil Kahn, Esq.  
Christian P. Ogata, Esq.  
3883 Howard Hughes Parkway,  
Suite 1100  
Las Vegas, Nevada 89169  
Tel: (702) 784-5200

*Attorneys for Defendant  
Teachers Health Trust dba THT Trust*

DATED October 22, 2021.

KIND LAW

By: /s/ Michael Kind, Esq.  
Michael Kind, Esq.  
8860 South Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123  
Tel: (702) 337-2322

*Attorneys for Plaintiffs*

DATED October 22, 2021.

HAYES | WAKAYAMA

By: /s/ Jeremy D. Holmes, Esq.  
Dale A. Hayes, Jr., Esq.  
Liane K. Wakayama, Esq.  
Jeremy D. Holmes, Esq.  
5798 S Durango Drive, Suite 105  
Las Vegas, Nevada 89113  
Tel: (702) 656-0808

*Attorneys for Defendant Digestive Disease  
Center*

**ORDER**

Good cause appearing, **IT IS HEREBY ORDERED** that THT Health and DDS shall respond to Plaintiffs' complaint on or before November 22, 2021.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: October 25, 2021